



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JAN 27 2011

Mr. Jonathan K. Markoff
Compass Big Blue, LLC
1302 West Randolph Street
Chicago, Illinois 60607

Mr. John M. Kuper
DeNovo Properties, Inc.
1300 West Randolph Street
Chicago, Illinois 60607

RE: Notification & Certification of Self-Implementing Cleanup and Disposal of PCB
Remediation Waste at Former GST Steel Facility, Tract F-7, 8116 Wilson Road,
Kansas City, MO
EPA ID No. MOD 007 118 029

Dear Mr. Markoff and Mr. Kuper:

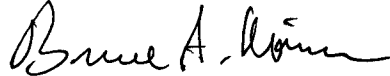
This letter is in response to Compass Big Blue, LLC (Compass) December 13, 2010, submission of the Notification & Certification of Self-Implementing Cleanup and Disposal of PCB Remediation Waste at the former GST Steel Facility, Tract F-7 (GST), 8116 Wilson Road, Kansas City, Missouri, dated December 8, 2010, and request for review. The following are the U.S. Environmental Protection Agency Region 7's (EPA) comments on your submission that should be included in a revision to the document: To be submitted within 30 days of receipt of this letter.

1. The cleanup report needs to include a discussion of a deed restriction on the property and an Operations and Maintenance Plan which is required when PCBs at or greater than 25 ppm in soil are left at a site.
2. For Sample CS-104, Table A shows 2' - 2.25' while analytical results show 0'-2.25'. This should be corrected for consistency.
3. Analytical Results from Pace Analytical state that the Preparation Method: EPA 3546 was used. Why wasn't extraction method 3500B/3540C or 3500B/3550B used as required by 40 CFR, Part 761, Subpart O?
4. The final approved version of the cleanup report should be sent to the Director of the Missouri Department of Natural Resources and the Environmental Director of Jackson County or the City of Kansas City, Missouri as required by 40 CFR § 761.61(a)(ii)(3).

5. It appears that sample Nos. CS-120, -121, and -122 should be run and results provided in the Report to better determine the extent of the next round of soil excavation.

If you have any questions, or wish to discuss these comments, I can be reached at (913) 551-7755 or you may email me at morrison.bruce@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Morrison". The signature is fluid and cursive, with the first name "Bruce" being the most prominent.

Bruce A. Morrison
Project Manager
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
Glen Schwartz, Mile Rail, LLC